

Our Ref: MK/KN0169/24

24 June 2025

Ms R Simpkin
Senior Planning Officer (Majors & Commercial)
Development Services
High Peak Borough Council

via email

Dear Rachael,

RE: Holehouse Mill, Chisworth SK13 5DH
Application Reference: HPK/2023/0118

I refer to the above planning application and the various discussions and meetings that have taken place since September 2024. We are now in a position to formally amend the planning application, and the purpose of this letter is to set out the details of the revised proposals, introduce the amended technical reports, and to provide a summary of the case for planning permission to be granted.

Formal Amendments

We propose that the application description be amended to the following:

'Demolition of existing Mill outbuildings and renovation of Mill into 8 apartments, and erection of 29 new dwellings together with associated car parking, landscaping and highway works'.

The revision includes a formal amendment to the submitted red line plan, essentially involving a minor amendment to completely exclude the existing two terraced units to the north of the Mill building from the red line. As such, as the red line will marginally decrease in size and not involve additional landowners, we trust that this minor amendment will be accepted.

In summary, the revised proposals involve the following:

- conversion of the existing Mill building into 6 x 2 bed and 2 x 1 bed apartments (referred on the plans as Block A);
- the construction of two linear blocks of split 2/3 storey houses along the northern part of site (referred to as Block B) providing 9 x 3 bed and 5 x 4 bed units;



- the construction of two linear blocks of split 2/3 storey houses along the southern part of the site (referred to as Block C) providing 12 x 3 bed units; and
- the construction of a terrace of two storey units providing 3 x 3 bed units (referred to as Block D).

Revised Drawings and Documents

The following drawings and documents accompany this submission:

1. Planning Drawings produced by JDA:
 - Site Location Plan: 1225_A_DR_000_Rev D
 - Proposed Site Plan (1:1000) Ref: 1225_A_DR_001 Rev M
 - Proposed Site Plan (1:500) Ref: 1225_A_DR_028 Rev A
 - Existing Mill Plans and Elevations 1225_A_007 Rev C
 - Proposed Block A Plans Ref: 1225_A_DR_016 Rev A
 - Proposed Block A Elevations Ref: 1225_A_DR_17 Rev A
 - Proposed Block B Plans Ref: 1225_A_DR_018 Rev A
 - Proposed Block B Elevations Ref: 1225_A_DR_019 Rev A
 - Proposed Block C Plans Ref: 1225_A_DR_020 Rev A
 - Proposed Block C Elevation Ref: 1225_A_DR_021 Rev A
 - Proposed Block D Plans Ref: 1225_A_DR_022 Rev A
 - Proposed Block D Elevations Ref: 1225_A_DR_023 Rev A
 - Proposed Street Scenes Ref: 1225_A_DR_024 Rev A
 - Proposed Site Section A-A Ref: 1225_A_DR_025 Rev A
 - Proposed Site Section B-B Ref: 1225_A_DR_026 Rev A
 - Proposed Site Section C-C Ref: 1225_A_DR_027 Rev A
2. Landscape Drawings produced by Trevor Bridge Associates
 - Landscape Proposals (Sheet 1 of 2) Ref: 6805.01H
 - Landscape proposals (Sheet 2 of 2) Ref: 6805.02H
3. Proposed Site Access General Arrangements Ref: 8726-ZZ-XX-DR-C-9001
4. Existing Building Areas and Volumes Drawing Ref: 923-EX01D by Edifice
5. Design and Access Statement by JDA
6. Arboricultural Impact Assessment by Woodsage Consulting
7. Landscape Management Plan by Trevor Bridge Associates



8. Updated Ecological Assessment by Dunelm Ecology
9. Updated BNG Metric by Dunelm Ecology
10. Transport Statement by CTS Traffic
11. Flood Risk Assessment by WML Consulting
12. Preliminary Drainage Proposals Ref: 8726-ZZ-XX-DR-C-1001 Rev P10
13. Energy / Sustainability Statement by Anderson Goddard
14. Heritage Assessment by Walsingham Planning

In addition, this covering letter acts as the Planning Statement for the revised proposals.

Principle of Development

The principle of the redevelopment of the site for residential use has previously been established through the grant of outline planning permission in 2009 and again in 2012, with reserved matters approval for the latter obtained in October 2015.

The site is a brownfield site with a lengthy industrial past. The last industrial use of the site was by Prisma Colour who vacated the site in 2020 and moved their operations to the Thornsett Trading Estate in Birchvale. The site has been vacant since then and the buildings are, as you are well aware, falling into disrepair and certainly no longer suitable for employment use.

While the previous permissions included the use of the Mill building for office use, such a use is now not considered viable given the costs involved in refurbishing the building relative to the expected rental income that could be achieved in this location. Historically the Mill building was in office use in connection with the manufacturing use of the site. Now that use has ended there is no demand for a office building in isolation in this location.

Relevant Local Plan Policies SO6, EI and E4 are applicable and generally seek to restrict the change of use of existing business land and premises, but do allow exceptions. As indicated, the Holehouse Mill complex is run down and incapable of accommodating an employment use without significant investment and redevelopment which is unlikely. This is one of the reasons why Prisma Colour relocated elsewhere within the district five years ago, and in this respect it is important to note they continue to be a local employer.

I believe it is accepted, following our various discussions, that the Mill building which is to be retained is best converted to residential use to ensure a viable future that maintains the building. To this end, no further information or justification should be required to demonstrate compliance with the employment retention policies of the Development Plan. In any event, as I refer to later in this letter,



this is a case where the 'tilted balance' will apply which would support the redevelopment of the entire site for residential purposes.

The other key land use principle is the location of the site within the Green Belt. Since the planning application was submitted there has been a change to the National Planning Policy Framework (NPPF) which is particularly pertinent to the application proposals. Paragraph 154 (g) advises that the partial or complete redevelopment of previously developed land, whether redundant or in continuing use, which would not cause substantial harm to the openness of the Green Belt is not 'inappropriate' development. The test of 'substantial harm to the openness' is a subjective one, but as a starting point one needs to look at the existing buildings on the site.

The application proposals are now accompanied by a drawing (ref: 923-EX01D) prepared by Edifice Building Surveyors, which summarises a measured survey of the areas and volume of all buildings on the site. Each building has been measured, and details are contained on separate drawing sheets which can be provided if required. The key thing to note however is that the total floor area of existing buildings within the amended application red line amounts to 5,243sq.m, and the volume of all buildings equates to 22,979m³.

In comparison, the proposed development including the retained Mill building has a gross floor area of 5,200sq.m, and a building volume of 18,816m³.

It can therefore be seen that the proposals are smaller in both floor area (-43sq.m) and volume (-4,163m³).

It is also the case that the location of the new built development (in particular Blocks B and C) has been selected in part to replicate the location of existing buildings on site and, recognising the change in levels, to ensure that the buildings work with the existing topography so that they do not lead to much, if any, greater impact on the openness of the Green Belt than what is there at present.

As the proposals do not have a substantially greater impact on the openness of the Green Belt we consider that the proposal should be considered as appropriate development in Green Belt policy terms as defined by the NPPF. To this end, Local Plan Policy EQ4 which advises that planning permission will not be granted for development unless it is in accordance with National Planning Policy, is satisfied.

Layout, Design and Heritage Issues

The revised proposals have taken on board the various comments received from Planning Officers since September 2024, and seek to provide an appropriate response for the existing site context in terms of layout, design and heritage issues. The updated DAS explains the proposals and the design approach taken, and the following summarises the key features of the development:

- The retention and sensitive alteration and repair of the original, stone Mill building to allow conversion to 8 residential apartments.



- Enhancement of the historic Mill Pond to create a new public space.
- Creation of new 'village square' public open space at the heart of the development.
- Car parking design to remove excessive frontage parking from the fronts of the houses to give positive useable urban realm.
- Creation of a linear building range to the north of the site conceived as a 19th Century industrial style building and reflecting the form of the former three storey stone and brick building (the Rope Works) with a scale informed by the existing site levels.
- Creation of a linear building range with a form conceived as a 20th Century industrial style building with a sawtooth aesthetic, undercroft parking and a scale which works with the existing levels within the site.
- Utilisation of the historic stream to provide blue infrastructure and create attractive outdoor areas for the proposed dwellings within Block B.
- A vernacular design approach to Block D which reflects the traditional scale and form of the nearby terraced cottages and which responds to the positioning in relation to the Mill building.
- Enhancement of the historic footpath connection from the site onto Marple Road to the south which has become overgrown and impassible.

In terms of residential amenity, the proposals work with the existing site topography to ensure adequate spacing between Blocks A-B; B-C; C-D; and A-D. This is best demonstrated on the site section drawings ref: 025 Rev A, 026 Rev A & 027 Rev A which demonstrate that the minimum separation distance from habitable room to habitable room is approximately 19 metres.

To meet the requirements of Local Plan Policy H3, the residential mix now proposed has been broadened and is as follows:

Size	Unit Numbers	% of Overall Mix
1 Bed	2	5%
2 Bed	6	16%
3 Bed	24	65%
4 Bed	5	14%
Total	37	100%

Of the above, 22% of the units are apartments, and therefore it is considered that the proposals can reasonably meet the requirements and future needs of a wide range of household types while also contributing positively to the promotion of sustainable and inclusive communities taking into account the characteristics of the existing housing stock in the surrounding locality. It is therefore considered that the proposal complies with Policy H3.

In terms of car parking provision, a total of 73 spaces are provided across the site as follows:



- Parking court to the rear of Block A - 9 spaces.
- Parking court to the west of Block B - 12 spaces
- Parking spaces to the front of Block B – 14 spaces
- Parking court between Blocks C & D - 13 spaces
- Undercroft / garage spaces in Block C – 24 spaces
- Space to west of Block C – 1 space

The updated Transport Statement prepared by CTS reviews the proposals against the car parking standards provided by the District Council and the more recent standards adopted by Derbyshire County Council (DCC). There is a difference between DCC standards (60 spaces) and High Peak standards (78 spaces), and it is considered that the provision of 73 spaces including 7 visitor spaces provides an appropriate and correct balance for development.

It is noted that 24 of the car parking spaces (2 per dwelling within Block C) are provided within garages which the DCC standards advise should not be included in the overall car parking numbers because garages can be converted from parking use without planning permission. However in this case, the garage parking forms an important design feature of Block C, and the applicant proposes a planning condition be imposed to ensure that the garages cannot be converted into residential accommodation and must be maintained for parking.

The proposed Site Layout Plan identifies how the car parking can be distributed throughout the development to provide adequate spaces for each unit, including visitor parking, but it is currently proposed that no space will be specifically allocated to any particular dwelling. This non-allocation of spaces will maximise potential use and leave any un-used spaces available for visitor or delivery parking.

The Transport Statement contains tracking diagrams to demonstrate that the site can be adequately accessed by a large refuse vehicle and a fire tender, such that they are able to pass through and also turn at various points within the site to return out in forward gear.

Overall, it is considered that the proposals achieve an appropriate level of development for the site, achieving an overall density of 22 dwellings per hectare, while ensuring adequate car parking, private and communal amenity areas, landscaping, space for service vehicles and adequate separation distances between the individual development blocks. As such, the proposals are considered to meet the requirements of Local Plan Policies SI and EQ6.

In drawing up the revised proposals specific regard has been paid to the Mill, a non-designated heritage asset, and the Holehouse Conservation Area, which includes the Mill Pond and eastern part of the site access road. A new Heritage Statement has been prepared by Walsingham Planning which accompanies the revised proposals and follows the guidance published by Historic England and the requirements of the NPPF.

It is noted that redevelopment of the site has the potential to affect the significance of these heritage assets through introducing change, but the layout and design response that has emerged seeks to



minimise potential adverse effect and support the viable redevelopment of the site within its historic industrial context.

The Heritage Statement concludes that there will be no harm to the significance to the Conservation Area arising out of the proposals, that the alteration and conversion of the Mill building and the loss of all other ancillary buildings on the site will lead to enhancement to the setting of the Conservation Area through sensitive, high quality redevelopment of an unattractive vacant and deteriorating site, and through the maintenance and management of the Mill Pond which falls within the Conservation Area.

In respect to the impacts to the significance of Holehouse Mill as a non-designated heritage asset, the retention of the original Mill building and its conversion to apartments will ensure it is brought into a beneficial and sustainable use that secures its future as the principal and defining heritage asset of the site as well as conserving the positive contribution the building makes to the setting of the Conservation Area.

Whilst no heritage harm is judged to result from the proposals, the scheme will deliver significant public benefits which could, should any heritage harm be perceived, be waved against any perceived heritage harm. As such it is considered that the revised proposals comply with Local Plan Policy EQ7 and paragraph 215 of the NPPF.

Highways, Flood Risk and Drainage

A revised Transport Statement has been submitted with the revised proposals, which examines the increase in traffic movements from the site as a result of the greater number of residential units proposed, and also responds to DCC's consultation response on the previous proposals.

In the case of the vehicular access to the site, the Transport Statement and separate access drawing 8726-ZZ-XX-DR-C-9001 demonstrates that the required 2.4m x 43m visibility splay can be achieved. The site access road will remain unadopted but will be upgraded, and a sett course will be placed to delineate the extent of the adopted junction with the A626. At this point, dropped kerbs and tarmac highlighting will be provided to demonstrate a safe pedestrian crossing point.

Footways will be provided on both sides of the new access road; on the northern side this will begin after the electricity sub station while on the southern side it will begin towards the eastern end.

The principal pedestrian access to the site will be via a new dedicated footway provided between Blocks C and D, which will link the site directly to the A626 to the west of the highway access, and close to the current bus stops. The footpath will be clearly signed at both ends.

In terms of flood risk, a revised Flood Risk Assessment has been prepared by WML Consulting, which responds to the previous consultation comments from the LLFA and Environment Agency. The report, and accompanying Drainage Strategy drawing ref: 8726-ZZ-XX-DR-C-1001 Rev P08. proposes that



surface water discharge is allowed to pass into the existing culverted watercourse. A planning condition requiring submission of detailed drainage design is invited.

The WML report demonstrates that the proposed development will not increase flood risk within the site area or within the wider development. Furthermore, the report identifies that a betterment of 60% can be achieved.

Landscape, Trees and Ecology

The landscape proposals for the site have been updated by Trevor Bridge Associates to address the revised site layout plan and previous consultation comments. They are supplemented by a Landscape Management Plan which sets out the proposed management regime to be followed once the landscape works have been implemented.

The proposed landscaping includes new tree planting at a ratio in excess of 2 new trees to each one proposed to be removed. An updated Arboricultural Impact Assessment by Woodsage Consulting is also provided. The proposals therefore meet the requirements of Local Plan Policies EQ8 and EQ9.

In terms of Ecology, Dunlem Ecology have further updated their report last issued in September 2024, and this responds to the revised proposals and also the limited consultation comments by Derbyshire Wildlife Trust. The report includes details of the bat surveys carried out in 2024.

While the application proposals are not required to comply with the statutory minimum 10% Bio-Diversity Net Gain requirements, the Ecology Report is accompanied by the DEFRA Metric. This demonstrates that the habitat enhancement and creation measures for the scheme will result in a net gain of 18.86% or 0.91 habitat units, and a net gain of 5.36% in respect of watercourse and 562.77% net gain in linear habitats. As such, it is considered that Local Plan Policy EQ5 is satisfied.

Energy and Sustainability

A report by Anderson Goddard has been prepared to consider the most appropriate measures to reduce energy consumption and carbon dioxide emissions within the development. In addition to fabric first methodology, the report recommends the integration of solar photovoltaics into the final design of the houses, as these will have the largest effect on carbon reduction and primary energy reduction.

Mellor Homes will build the houses using local materials and will ensure all the homes reach and Energy Performance Certificate Level A.

It is therefore considered that the proposals comply with the low carbon objectives of Local Plan Policy EQ1.



Affordable Housing Provision

The scale of the proposals is such that under Policy H4 of the Local Plan, the development should provide 30% affordable housing. However, given the existing buildings on site the Government's Vacant Building Credit (VBC) incentive is applicable as set out at paragraph 65 and footnote 30 of the NPPF.

The calculation of the VBC for the proposed development is as follows:

1. Affordable Housing Policy requirement: 37 units x 30% = 11.1 units
2. Existing gross building floorspace within red line: 5,243sq.m
3. Proposed gross building floorspace: 5,200sq.m
4. Existing floorspace as % of new residential floorspace = 100.8%
5. 11.1 units minus 100.8% = Nil units

Accordingly it is considered that no affordable housing needs to be provided.

Planning Balance

As you know, the NPPF provides a presumption in favour of sustainable development. Paragraph 11 of the NPPF advises that for decision taking, this means approving development proposals that accord with an up to date development plan without delay, or where the policies which are the most important for determining the application are out of date, granting permission unless any adverse impacts of doing so would significantly or demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well designed places and providing affordable homes, individually or in combination.

It is our view that application proposals in their revised form now comply with the development plan when taken as a whole. This includes Policies S1, S1a, S06, E1, E4, H3, H4, EQ1, EQ4, EQ5, EQ6, EQ7, EQ8 and EQ9.

Notwithstanding this, it is also relevant that the High Peak Local Plan is now out of date having regard to footnote 8 of the NPPF. Specifically, as confirmed by the Council's Five-Year Housing Land Supply Interim Position Statement (March 2025), the Council can only demonstrate 2.85 years supply of housing against the minimum requirement of five years. This means that in the determination of the application for residential development, the 'tilted balance' applies.

There are a number of significant benefits arising out of the application proposals which include the following:

1. The regeneration of a vacant and deteriorating brownfield site.
2. Making an efficient use of previously developed land in accordance with one of the key aims of the NPPF.



3. The delivery of 37 new homes in arrange of house types and sizes which will contribute towards meeting local housing needs and the Council's housing land supply.
4. Delivering a medium sized site that will be developed by a Small and Medium Enterprise Housebuilder (Mellor Homes) as encouraged by paragraph 73 of the NPPF.
5. The creation of local employment through construction jobs.
6. The delivery of low energy consuming and carbon efficient new homes.
7. Heritage benefits including the conversion and reuse of the Mill building and the enhancement of the Holehouse Conservation Area.
8. Enhancement of the former Mill Pond as public green space accessible to the local community and residents of the proposed development.
9. Reinstatement of the historic footpath connection from the south of the site to Marple Road for use by the local community and residents of the proposed development.
10. Improvements to the exiting site access into the site which will benefit both new residents and existing residents served by the access track

As stated above, while we consider that the proposals comply with the development plan, even if it is considered that there is conflict with certain planning policies, the above benefits are considered to outweigh that harm particularly when applying the 'tilted balance' as advocated by paragraph 11 of the NPPF.

Accordingly, we trust that these revised proposals will be considered positively by the Council following the necessary re-consultation. We confirm that we would be happy to work closely with Officers in response to any queries arising.

Yours sincerely,



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